

## **REMARKS**

Claims 1-15 are currently pending in the application. Claim 1 is an independent claim and claims 2-15 depend there from. Dependent claims 3-10 and 15 are currently amended to overcome minor informalities noticed by the Examiner. The Applicant respectfully asserts that the minor amendments to dependent claims 3-10 and 15 do not alter the scope of the claims as originally presented, but rather correct minor grammatical errors objected to by the Examiner. The Applicant respectfully requests that the application be reconsidered in view of the amendments set forth above and the following remarks.

In paragraph 1 on page 2 of the Office Action, dependent claims 3-10 and 15 were objected to for minor informalities. The Applicant respectfully traverses the objections, however, in order to advance prosecution in the application, the Applicant has amended claims 3-10 and 15 to correct the noticed minor informalities. The Applicant believes the amendments to dependent claims 3-10 and 15 have indeed overcome the noticed minor informalities and therefore respectfully requests that the objections be withdrawn.

In paragraph 2 and 3 on pages 2 and 3 of the Office Action, claim 1-15 were rejected under the judicially created doctrine of obviousness-type double patenting in view of Applicant's pending parent application 10/294,880. The Applicant respectfully traverses the double patenting objection, however, in order to advance prosecution in the application, the Applicant has submitted a TERMINAL DISCLAIMER under separate cover as part of this response. The Applicant respectfully asserts that submission of the instant TERMINAL DISCLAIMER renders the double patenting rejections moot. The Applicant respectfully requests that the double patenting rejection be withdrawn.

In paragraph 5 on page 4 of the Office Action, independent claim 1 and dependent claims 2-7, 9-10 and 12 were rejected under 35 U.S.C. § 102(e) as being anticipated by McCormack et al. U.S. Patent 6,395,591 (McCormack). The Applicant respectfully traverses the rejections for at least the following reasons.

The Applicant sets forth in independent claim 1 a system for reducing noise in a chip. The system may comprise, among other things, a substrate layer integrated within the chip and a transistor layer integrated within the chip. The transistor layer may be shielded from said substrate layer by a shielding layer. The system may also comprise at least one transistor of a first transistor type that couples said transistor layer to said shielding layer and a quiet voltage source that is coupled to said at least one transistor of said first transistor type.

McCormack is different from the Applicant's independent claim 1. McCormack at least fails to disclose a quiet voltage source coupled to at least one transistor of a first resistor type as set forth in Applicant's claim 1. Instead, McCormack teaches an analog ground connection (col. 3, lines 15-16). The term analog ground is defined in McCormack to be an electrical ground for circuitry that is noise sensitive (col. 3, lines 45-47). The analog ground is also referred to as the quiet ground whereas the digital ground is referred to as the noisy ground (col. 3, lines 53-55).

The Applicant respectfully asserts that the analog ground (quiet ground) disclosed in McCormack is different from the quiet voltage source set forth in the Applicant's claim 1. On page 4 of the Office Action, the Examiner characterizes the analog ground 26 disclosed in McCormack as a quiet voltage source instead of an analog (quiet) ground as disclosed in McCormack. The Applicant respectfully disagrees. The Applicant respectfully asserts that a ground is not a voltage source. A ground may be a voltage sink, but may not be a voltage source.

For at least the reasons set forth above, the Applicant respectfully asserts that claim 1 is allowable over McCormack. The Applicants request that the rejection of claim 1 be withdrawn.

Because dependent claims 2-15 depend, directly or indirectly, from independent claim 1, and because claim 1 is allowable over McCormack, the Applicant asserts that rejections of dependent claims 2-15 are now moot. The Applicant asserts that claims 2-

15 are also allowable over McCormack and requests that the rejections of claims 2-15 be withdrawn.

In paragraph 7 on page 5 of the Office Action, dependent claim 8 was rejected under 35 U.S.C. § 103(a) as being unpatentable over McCormack in view of Vinal U.S. Patent 5,151,759 (Vinal). The Applicant respectfully traverses the rejections for at least the following reasons.

Vinal fails to remedy the deficiencies of McCormack. McCormack, even if combined with Vinal, is different from the Applicant's independent claim 1. The proposed combination of McCormack and Vinal fails to disclose, among other things, a quiet voltage source coupled to at least one transistor of a first resistor type as set forth in Applicant's claim 1. McCormack merely teaches an analog ground connection (see discussion and arguments set forth above). Vinal is silent regarding a quiet voltage source being coupled to at least one transistor of a first resistor type as set forth in Applicant's claim 1.

The Applicant respectfully asserts that the analog ground taught by the proposed combination of McCormack and Vinal is different from a quiet voltage source as set forth in the Applicant's claim 1.

For at least the reasons set forth above, the Applicant respectfully asserts that claim 1 is allowable over the proposed combination of McCormack and Vinal. The Applicant requests that the rejection of claim 1 be withdrawn.

Because dependent claims 2-15 depend, directly or indirectly, from independent claim 1, and because claim 1 is allowable over the proposed combination of references, the Applicant asserts that rejections of dependent claims 2-15 are now moot. The Applicant asserts that claims 2-15 are also allowable over the cited references and requests that the rejections of claims 2-15 be withdrawn.

In paragraph 8 on page 5 of the Office Action, dependent claims 11 and 13 were rejected under 35 U.S.C. § 103(a) as being unpatentable over McCormack in view of Wei U.S. Patent 6,403,992 (Wei). The Applicant respectfully traverses the rejections for at least the following reasons.

Wei fails to remedy the deficiencies of McCormack. McCormack, even if combined with Wei, is different from the Applicant's independent claim 1. The proposed combination of McCormack and Wei at least fails to disclose a quiet voltage source coupled to at least one transistor of a first resistor type as set forth in Applicant's claim 1. McCormack merely teaches an analog ground connection (see discussion and arguments set forth above). Wei is silent regarding a quiet voltage source being coupled to at least one transistor of a first resistor type as set forth in Applicant's claim 1.

The Applicant respectfully asserts that the analog ground taught by the proposed combination of McCormack and Wei is different from a quiet voltage source as set forth in the Applicant's claim 1.

For at least the reasons set forth above, the Applicant respectfully asserts that claim 1 is allowable over the proposed combination of McCormack and Wei. The Applicants request that the rejection of claim 1 be withdrawn.

Because dependent claims 2-15 depend, directly or indirectly, from independent claim 1, and because claim 1 is allowable over the proposed combination of references, the Applicant asserts that rejections of dependent claims 2-15 are now moot. The Applicant asserts that claims 2-15 are also allowable over the cited references and requests that the rejections of claims 2-15 be withdrawn.

In paragraph 9 on page 6 of the Office Action, dependent claims 14-15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over McCormack in view of Puar et al. U.S. Patent 6,356,497 (Puar). The Applicant respectfully traverses the rejections for at least the following reasons.

Puar fails to remedy the deficiencies of McCormack. McCormack, even if combined with Puar, is different from the Applicant's independent claim 1. The proposed combination of McCormack and Puar at least fails to disclose a quiet voltage source coupled to at least one transistor of a first resistor type as set forth in Applicant's claim 1. McCormack merely teaches an analog ground connection (see discussion and arguments set forth above). Puar is silent regarding a quiet voltage source being coupled to at least one transistor of a first resistor type as set forth in Applicant's claim 1.

The Applicant respectfully asserts that the analog ground taught by the proposed combination of McCormack and Puar is different from a quiet voltage source as set forth in the Applicant's claim 1.

For at least the reasons set forth above, the Applicant respectfully asserts that claim 1 is allowable over the proposed combination of McCormack and Puar. The Applicants request that the rejection of claim 1 be withdrawn.

Because dependent claims 2-15 depend, directly or indirectly, from independent claim 1, and because claim 1 is allowable over the proposed combination of references, the Applicant asserts that rejections of dependent claims 2-15 are now moot. The Applicant asserts that claims 2-15 are also allowable over the cited references and requests that the rejections of claims 2-15 be withdrawn.

## CONCLUSION

Based on at least the foregoing, Applicants believe that claims 1-15 are in condition for allowance. Should the Examiner have any questions regarding this submission, the Applicant respectfully requests that the Examiner telephone the undersigned at 312-775-8000. Please charge any fees due in connection with this statement to the deposit account of McAndrews, Held & Malloy Account No. 13-0017.

A Notice of Allowance is courteously solicited.

Respectfully submitted,

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